

Since the introduction by Apple of inexpensive, easy to use wireless networking products based on the 802.11b standard, many companies and communities have discovered new ways of communicating using low-powered spread-spectrum devices operating in unlicensed spectrum.

The resulting low- and intermediate-range communication networks offer significantly *different* social advantages than the traditional large, centrally managed networks, fostering new communities and new business opportunities, and therefore should be given every possible advantage during this formative period.

I urge the FCC to take the following steps to promote the continued growth of such networks:

- designate additional large spectrum blocks for unlicensed use of spread-spectrum wideband and ultra-wideband devices.
- given the significantly lower possibility of interference between spread-spectrum and traditional wireless communications, allow overlay licenses for low-power, ultra-wideband devices.
- create or amend equipment certification rules for spread-spectrum devices to insure maximum interoperability.
- protect the existing spectrum used by 802.11b devices from encroachment by proposed new services, and develop rules which prevent future legislative 'highjacking' of spectrum already being used by significant numbers of individuals.
- encourage community development of local wireless networks by creating rules allowing the installation of wireless access point equipment (based on 802.11b and similar protocols) on existing telephone poles.